

This motion is denied without prejudice to renewal for failure to comply with Individual Rule III.A.1.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Clerk of Court is respectfully directed to close  
Dkt. No. 23.

S.J., individually and on behalf of K.H., a child with  
a disability,

Dated: August 5, 2020

New York, New York  
NOTICE OF MOTION



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

*Plaintiff,*

-against-

Case No. 20-cv-1922

NEW YORK CITY DEPARTMENT OF EDUCATION,

*Defendant.*

**PLEASE TAKE NOTICE** that upon the annexed papers; Plaintiff shall move this Court—following the applicable 21-day safe harbor period—for sanctions against Defendant and its counsel, pursuant to Federal Rule of Civil Procedure (“FRCP”) 11 at a date and time set by this Court.

**PLEASE TAKE FURTHER NOTICE** that opposition papers, if any, shall be filed and served in accordance with the Individual Rules of the Honorable Lorna G. Schofield and Local Rules of the Southern District of New York, or as otherwise directed by the Court;

**PLEASE TAKE FURTHER NOTICE** that this motion is being served in accordance with FRCP 11’s safe-harbor provision and will not be filed with the Court until at least 21 days after its service.

Dated: August 4, 2020  
Auburn, New York

Respectfully,

s/ Benjamin M. Kopp  
CUDDY LAW FIRM, PLLC  
Benjamin M. Kopp, Esq.  
*Attorneys for Plaintiff*  
5693 South Street Road  
Auburn, New York 13021  
Tel.: (315) 207-5584  
bkopp@cuddylawfirm.com